

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED  
May 4 4 35 PM '01  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY  
MAIL RATE CATEGORIES, 2001

Docket No. MC2001-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KALENKA TO INTERROGATORY OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(May 4, 2001)

The United States Postal Service hereby give notice that it is filing a revised response of witness Kalenka to the following interrogatory: OCA/USPS-T3-1.

The original response was filed on April 18, 2001. The revised response being filed today supersedes that response.

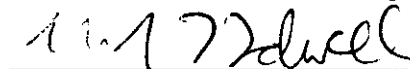
The interrogatory is stated verbatim and is followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
Tel: (202) 268-2998; Fax: -5402  
May 4, 2001

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KALENKA  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T3-1.

- a. Does the Group One software possessed by ADP have the capability to arrange mailing lists in presort order for pieces mailed at Priority Mail rates? Please explain.
- b. To what extent does ADP currently use the Group One software to presort Priority Mail pieces? What depth of sort does ADP typically achieve? Please explain.

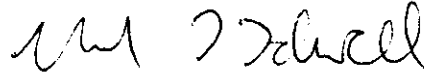
RESPONSE:

a&b.

ADP currently uses the Group One software program to arrange First-Class Mail and Standard Mail lists in presort order. As indicated in my testimony at the sentence beginning on page 4, line 19, we use the software for all of our mailings, including those which are sent Priority Mail. See my response to OCA/USPS-T3-

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "M. Tidwell", is written above a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
May 4, 2001